

# Exhibit C

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION**

Margery Frieda Mock and Eric Scott Ogden,  
Jr., *individually and on behalf of those  
similarly situated,*

Plaintiffs,

v.

Glynn County, Georgia; E. Neal Jump, Glynn  
County Sheriff; Alex Atwood, Glynn County  
Magistrate Judge; and B. Reid Zeh, III, Glynn  
County Misdemeanor Public Defender;  
Defendants.

Case No. 2:18-cv-0025-LGW-RSB  
(Class Action)

**DECLARATION OF BARBARA R. HAMILTON**

I, Barbara R. Hamilton, under penalty of perjury, declare as follows:

1. I am a seventy-eight-year-old woman.
2. I am the mother of Robert Franklin Cox, Jr., who has also submitted a declaration in this matter.
3. I have lived in Tiff County, Georgia for 55 years.
4. My son, Robert, has long suffered from an alcohol use disorder. Because of this struggle, he has been arrested and charged with misdemeanors numerous times in Glynn County. He has frequently been incarcerated because he was unable to pay his bail.
5. My son has required the assistance of the Glynn County State Court Public Defender, B. Reid Zeh when he has been accused of misdemeanors in the past. On one occasion, Robert informed me that Mr. Zeh would not represent him in a misdemeanor case unless Robert came up with \$2,500 to pay Mr. Zeh. Robert could not afford to pay Mr. Zeh, so I did.

6. On early 2015, I paid Reid Zeh \$2,500 to take on my son Robert's case as his public defender. I believed this was the only way that Mr. Zeh would represent my son.

7. I was not aware that Mr. Zeh was already paid by Glynn County to take misdemeanor criminal cases for indigent persons. I relied on Mr. Zeh's representation that this money was necessary before he would help Robert.

8. As result of Mr. Zeh's dishonesty, I suffered a loss of \$2,500.

I declare under penalty of perjury that this is true and correct.

Barbara S. Hamilton

Name

6-25-2018

Date